

WYOMING E-WASTE FACILITY: Burns, WY

Background:

Redacted Information

Burns Facility: Tatooine Industries International (formerly Andromeda Recycle City)
4390 I-80 Service Road
Burns, WY

There are two buildings and several truck trailers. The property is not fenced and is surrounded by farm land.

Latest DEQ visit inside the buildings:

DEQ visited the site on April 27, 2016. The inspection involved a walkthrough of Building 1 and a brief look around the outside of the buildings. Building 1 was the e-waste processing building when the site was operational. Building 1 was also used to store e-waste and processed recyclables. WDEQ noted the following issues:

- 1) a locked cabinet on the north wall that states that it contains PCB containing equipment;
- 2) used oil, pcb oil and other liquid waste near the south wall bay door. The liquid containers are placed in large livestock watering tanks which function as secondary containment;
- 3) 3-refrigerators that reportedly store mercury of unknown type (possibly mercury switches, elemental mercury, etc.). Photos were taken of the contents of the refrigerators (everything appeared to be containerized) but the type and nature if the waste could not be verified.

The majority of the e-waste stored in the northwest quadrant is reported to be unprocessed computer monitors and other computer equipment. The other parts of the building (upstairs, offices, etc.) contained minimal amounts of e-waste and other junk.

EPA and DEQ visit without building entry:

EPA representatives accompanied the state to the site on May 16, 2016. The inspectors did not enter the buildings but walked around the outside evaluating the current storage condition of the site. The following concerns were noted:

- 1.) Site security: the site is not fenced. The building alarms installed by the bank are no longer being maintained. The broken office window gives evidence of intruders. The outside storage of computers and televisions are enticing to vandals.
- 2.) Potential violations: a) used, intact CRTs are excluded from hazardous waste regulations as long as they are not disposed or speculatively accumulated (40 CFR Section 261.4(a)(22)(i); the facility has been closed since July 2014. b) used, broken CRTs destined for recycling are excluded from hazardous waste regulation if they are stored in a building with a roof, floor and walls or placed in a container that meets the regulatory requirements and not speculatively accumulated; again these have been stored since July 2014. c) Processed CRT glass is conditionally excluded from hazardous waste regulation as long as it is not speculatively accumulated; no recycling has occurred since July 2014.
- 3.) Environmental concerns: possible release of mercury vapors from the mercury stored in the refrigerators as summer approaches and temperatures increase, CRTs or other electronic devices stored outside igniting as those in Utah, unlabeled unsecured salvage drums, prolonged storage of PCB oil.
- 4.) Release of personally identifiable information (PII): PII is likely still on hard drives and computers. Tatooine customers included the state of Wyoming and schools throughout Wyoming and Montana, including those on reservations. It is conceivable that PII is accessible should vandals raid the site.

State assessment following facility closure, including mercury vapor survey:

State assessment on 12/1/2014, followed by a mercury vapor survey on 12/17/2014. The state assessed both the site conditions inside and outside of two buildings. The mercury vapor survey used a Jerome J-405 mercury vapor analyzer.

Results of site walkthrough: There were approximately 125 Gaylords which had e-wastes including 105 gaylords of broken CRT glass. There were also three wooden boxes of what appeared to be fluorescent light ballasts. The inspector observed an open top semi-trailer which reportedly contains aluminum parts from an aircraft and 9 parked semi-trailers containing e-wastes.

Building 2: Outside of this building were 5 semi-trailers reportedly containing unprocessed e-waste.

Inside Building 1: e-waste in various states of disassembly, including 3 gaylords of broken CRT glass that appeared to be leaded glass. There were 3 working refrigerators holding closed containers of mercury, a partial gaylord of what appeared to be smoke detectors, and a pallet of lead acid batteries.

Inside Building 2: This building was full of e-waste awaiting deconstruction.

Mercury Vapor Survey: Building 1, ambient air was sampled for mercury vapor at floor level and eye level at 14 discreet locations, one sample was taken in each refrigerator storing mercury (3 total) and 3 samples were taken at floor level around the area where the mercury was stored. A total of 34 discrete samples were taken. Only the samples within the refrigerators had positive readings: Large refrigerator: 1.02 micrograms/cubic meter; medium refrigerator: 0.76 micrograms/cubic meter; small refrigerator: 2.02 micrograms/ cubic meter.

In Building 2, a total of two discrete samples at one location were taken at floor level and at eye level. Both samples registered 0.00 micrograms/cubic meter of mercury.

Contacts:

State: Joel Frost, WDEQ RCRA Inspector, (307) 777-7246
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Jeremy Gross, Wyoming Attorney General's Office

Federal: William Cownover, Business Specialist, State Environmental Coordinator,
Rural Development, US Department of Agriculture

Bank: Brittany Reddy, Executive Vice President and CFO
Cheyenne State Bank

Photo:1

Facility: Tatoonie

**Subject: Main Processing Building
with E-Wastes Stored in Front of Bays**

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Photo: 2

Facility: Tatoonie

**Subject: Collapsing Gaylord Boxes
Holding E-Wastes**

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Photo: 3

Facility: Tatooine

**Subject: Broken Window: Evidence
of Intruders**

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Photo: 4

Facility: Tatooine

Subject: 4 Unlabeled Salvage Drums

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Photo: 5

Facility: Tatooine

**Subject: Close up of E-Wastes in
Outside Storage**

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Photo: 6

Facility: Tatooine

Subject: E-Wastes Outdoor Storage

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Photo: 7

Facility: Tatooine

Subject: 5 of the Truck Trailers Full of E-Wastes

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Photo: 8

Facility: Tatooine

Subject: Broken Glass and Pallets in Foreground & Gaylords and Second Storage Building in Background

Photographer: Philippe Pierre-Louis

Date: May 16, 2016



Ackerman, Joyce

From: Jacobson, Linda
Sent: Monday, June 13, 2016 4:13 PM
To: Ackerman, Joyce
Cc: Urdiales, Aaron; Pierre-Louis, Philippe
Subject: Tatooine: recent EPA site visit



Tatooine Brief.ppt



WY e waste
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